

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ZHEJIANG TOPOINT PHOTOVOLTAIC  
CO., LTD.,

Plaintiff,

-against-

G&S SOLAR INSTALLERS LLC,

Defendant.

Docket No.: 19-cv-05078 (VSB)

**[PROPOSED] CONSENT ORDER  
TRANSFERRING VENUE**

This matter coming before the Court on the motion of Defendant, G&S Solar Installers, LLC (“G&S”), seeking dismissal of Plaintiff’s Complaint for improper venue pursuant to 28 U.S.C. § 1406(a), and the parties having consented through counsel to change venue in this matter pursuant to 28 U.S.C. §1404(a), as evidenced by the electronic signatures set forth below, and venue being proper in the District of New Jersey, and for good cause having been shown,

**IT IS** on this \_\_\_\_ day of August, 2019,

**ORDERED** that with the consent of all parties the request to transfer **GRANTED**; and it is further

**ORDERED** that Defendant, G&S Solar Installers, LLC’s motion seeking dismissal of Plaintiff’s Complaint for improper venue is hereby dismissed as moot; and it is further

**ORDERED** that the Clerk of Court shall transfer this action to the United States District Court for the District of New Jersey, Newark vicinage.

\_\_\_\_\_  
Hon. Vernon S. Broderick, U.S.D.J.

The undersigned counsel hereby  
consent to the form and substance  
of this Order:

**CONNELL FOLEY LLP**

/s/Aaron Gould  
AARON H. GOULD  
*Attorneys for Defendant*  
*G&S Solar Installers LLC*

**NGUYEN & CHEN, LLP**

/s/ Jiangang Ou  
JIANGANG OU  
BRIAN M. GARGANO

**THE LAW OFFICE OF THEODORE GEIGER, PLLC**

/s/ Theodore Geiger  
THEODORE GEIGER  
*Attorneys for Plaintiff*  
*Zhejiang Topoint Photovoltaic Co., Ltd.*